

IN THE UNITED STATES DISTRICT COURT
FOR THE
NORTHERN DISTRICT OF OHIO

UNITED STATES OF AMERICA,)	Case No. 5:18-cr-765
)	
Plaintiff,)	JUDGE James Gwin
)	
v.)	<u>MOTION TO CONTINUE</u>
)	
WILLIAM E. CALLAM,)	
)	
Defendant.)	

Now comes the defendant, William E. Callam, by and through the undersigned counsel and respectfully requests a continuance of the Sentencing Hearing scheduled for Thursday, April 25, 2019 at 12:30 PM.

The undersigned counsel, who has prepared to represent the defendant at his sentencing, and counsel's fiancé are expecting a child. The child, it is now believed, will be born on or about April 30th in London, in the United Kingdom, where her mother resides. As such, counsel has made arrangements to travel to London the week of the Sentencing hearing.

This is the first continuance the defendant, who plead via information, has requested. This request is not made for purposes of delay.

WHEREFORE, in the interest of justice, the defendant respectfully requests this Honorable Court issue an Order continuing the Sentencing Hearing to a later date convenient to the Court's schedule. Counsel returns to the United States on May 19th.

Respectfully submitted:

/s/ Matthew O. Williams
MATTHEW O. WILLIAMS, ESQ. (0090709)
DEAN M. VALORE, ESQ. (0071941)
MICHAEL J. GORDILLO, ESQ. (0073001)

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CERTIFICATE OF SERVICE

The foregoing Motion to Continue was filed via the Court's electronic filing system on this 15th Day of April 2019. The United States Attorney's Office will receive notice of this filing via that system and may view this filing through that system at any time.

Respectfully submitted:

/s/ Matthew O. Williams
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